

FILED

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CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

SOLOMON J. STALLINGS,

Defendant.

INDICTMENT

CASE NO.

5:23 CR

198

Title 18, United States Code, Sections 922(g)(1), 924(a)(8), and (c)(1)(A)(i); Title 21, United States Code, Sections 841(a)(1), (b)(1)(A), and (b)(1)(C)

JUDGE FLEMING

COUNT 1

(Felon in Possession of a Firearm and Ammunition,
18 U.S.C. §§ 922(g)(1) and 924(a)(8))

The Grand Jury charges:

1. On or about February 2, 2023, in the Northern District of Ohio, Eastern Division, Defendant SOLOMON J. STALLINGS, knowing he had previously been convicted of crimes punishable by imprisonment for a term exceeding one year, those being: Aggravated Trafficking in Drugs, on or about September 23, 1992, in case number 1992-07-1712-C, in the Court of Common Pleas of Summit County, Ohio; Aggravated Trafficking in Drugs, on or about August 23, 1996, in case number 1992-02-0397, in the Court of Common Pleas of Summit County, Ohio; Possession of Cocaine, on or about December 18, 1997, in case number 1997-08-1749-D, in the Court of Common Pleas of Summit County, Ohio; Trafficking Cocaine, on or about December 18, 1997, in case number 1997-10-2444, in the Court of Common Pleas of Summit County, Ohio; Aggravated Trafficking in Drugs and Possession of Heroin, on or about May 3, 2011, in case number 2010-03-0821-B, in the Court of Common Pleas of Summit County, Ohio;

Possession of Cocaine and Possession of Heroin, on or about May 4, 2011, in case number 2010-10-2914-A, in the Court of Common Pleas of Summit County, Ohio; and Possession of Drugs, on or about October 19, 2018, in case number 2017-04-1169, in the Court of Common Pleas of Summit County, Ohio, knowingly possessed in and affecting interstate and foreign commerce a firearm, to wit: a Vulcan model V10-45 .45 caliber semiautomatic pistol bearing serial number F10796, and ammunition, said firearm and ammunition having previously been shipped and transported in interstate and foreign commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

COUNT 2

(Felon in Possession of Firearms and Ammunition,
18 U.S.C. §§ 922(g)(1) and 924(a)(8))

The Grand Jury further charges:

2. On or about February 2, 2023, in the Northern District of Ohio, Eastern Division, Defendant SOLOMON J. STALLINGS, knowing he had previously been convicted of crimes punishable by imprisonment for a term exceeding one year, those being: Aggravated Trafficking in Drugs, on or about September 23, 1992, in case number 1992-07-1712-C, in the Court of Common Pleas of Summit County, Ohio; Aggravated Trafficking in Drugs, on or about August 23, 1996, in case number 1992-02-0397, in the Court of Common Pleas of Summit County, Ohio; Possession of Cocaine, on or about December 18, 1997, in case number 1997-08-1749-D, in the Court of Common Pleas of Summit County, Ohio; Trafficking Cocaine, on or about December 18, 1997, in case number 1997-10-2444, in the Court of Common Pleas of Summit County, Ohio; Aggravated Trafficking in Drugs and Possession of Heroin, on or about May 3, 2011, in case number 2010-03-0821-B, in the Court of Common Pleas of Summit County, Ohio; Possession of Cocaine and Possession of Heroin, on or about May 4, 2011, in case number 2010-

10-2914-A, in the Court of Common Pleas of Summit County, Ohio; and Possession of Drugs, on or about October 19, 2018, in case number 2017-04-1169, in the Court of Common Pleas of Summit County, Ohio, knowingly possessed in and affecting interstate and foreign commerce firearms, to wit: a Taurus model G2C 9mm caliber semiautomatic pistol bearing serial numbers ACG000063 (slide) and ADA827794 (frame); a Taurus model G2C 9mm caliber semiautomatic pistol bearing serial number 10114359; a Glock model 42 .380 auto caliber semiautomatic pistol bearing serial number ADAS559; and a Century Arms model Draco 7.62 caliber pistol bearing serial number SV7088332, and ammunition, said firearms and ammunition having previously been shipped and transported in interstate and foreign commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

COUNT 3

(Possession with Intent to Distribute Methamphetamine,
21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

The Grand Jury further charges:

3. On or about February 2, 2023, in the Northern District of Ohio, Eastern Division, Defendant SOLOMON J. STALLINGS did knowingly and intentionally possess with the intent to distribute 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A).

COUNT 4

(Possession with Intent to Distribute Cocaine,
21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

The Grand Jury further charges:

4. On or about February 2, 2023, in the Northern District of Ohio, Eastern Division, Defendant SOLOMON J. STALLINGS did knowingly and intentionally possess with the intent

to distribute a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 5

(Possession of Firearms in Furtherance of Drug Trafficking Offenses,
18 U.S.C. § 924(c)(1)(A)(i))

The Grand Jury further charges:

5. On or about February 2, 2023, in the Northern District of Ohio, Eastern Division, Defendant SOLOMON J. STALLINGS did knowingly possess firearms, specifically a Taurus model G2C 9mm caliber semiautomatic pistol bearing serial numbers ACG000063 (slide) and ADA827794 (frame); a Taurus model G2C 9mm caliber semiautomatic pistol bearing serial number 10114359; a Glock model 42 .380 auto caliber semiautomatic pistol bearing serial number ADAS559; a Century Arms model Draco 7.62 caliber pistol bearing serial number SV7088332; and a blue Polymer 80 9mm semiautomatic pistol bearing no serial number, and ammunition, in furtherance of drug trafficking crimes for which he may be prosecuted in a court of the United States, those being: Possession with Intent to Distribute Methamphetamine, as charged in Count 3 herein, Possession with Intent to Distribute Cocaine, as charged in Count 4 herein, in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

FORFEITURE

The Grand Jury further charges:

6. The allegations of Counts 1-5 of this Indictment are hereby re-alleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant to Title 21, United States Code, Section 853 (drug offenses) and Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c) (firearms offenses). As a result of these offenses, Defendant SOLOMON J. STALLINGS shall forfeit to the United States: (i) any

and all property constituting - or derived from - any proceeds the Defendant obtained, directly or indirectly, as the result of the drug offenses; (ii) any and all of the Defendant's property used - or intended to be used - in any manner or part, to commit or to facilitate the commission of the drug offenses; and, (iii) any and all firearms and ammunition involved in or used in the commission of the firearms offenses; including, but not limited to, the following:

a.) Vulcan model V10-45 .45 caliber semiautomatic pistol, bearing serial number: F10796, and ammunition (loaded in magazine with firearm), seized on February 2, 2023, pursuant to the execution of a search warrant at a location on Comet Lane, Clinton, Ohio.

b.) \$19,043.00 U.S. Currency seized on February 2, 2023, pursuant to the execution of a search warrant at a location on Comet Lane, Clinton, Ohio.

c.) Taurus model G2C 9mm caliber semiautomatic pistol, bearing serial numbers: ACG000063 (slide) and ADA827794 (frame), and ammunition (loaded in firearm), seized on February 2, 2023, pursuant to the execution of a search warrant at a location on Grant Street, Akron, Ohio.

d.) Taurus model G2C 9mm caliber semiautomatic pistol, bearing serial number: 10114359, and ammunition (loaded in firearm), seized on February 2, 2023, pursuant to the execution of a search warrant at a location on Grant Street, Akron, Ohio.

e.) Glock model 42 .380 auto caliber semiautomatic pistol, bearing serial number: ADAS559, and any ammunition, seized on February 2, 2023, pursuant to the execution of a search warrant at a location on Grant Street, Akron, Ohio.

f.) Century Arms model Draco 7.62 caliber pistol, bearing serial number: SV7088332, and any ammunition, seized on February 2, 2023, pursuant to the execution of a search warrant at a location on Grant Street, Akron, Ohio.

g.) blue Polymer 80 9mm semiautomatic pistol, bearing no serial number, and ammunition (loaded in firearm), seized on February 2, 2023, pursuant to the execution of a search warrant at a location on Grant Street, Akron, Ohio.

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.